

Robert W. Sadowski
Robert W. Sadowski PLLC
800 3rd Avenue, 28th Floor
New York, New York 10022
Tel. No.: (646) 503-5341
rsadowski@robertwsadowski.com
Attorneys for Plaintiff Amro Ali, M.D.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMRO ALI, M.D.,

Plaintiff,

- against -

WESTCHESTER MEDICAL CENTER and
NEW YORK MEDICAL COLLEGE,

Defendants.

No. 19-cv-08324 (DLC)(DCF)

DECLARATION OF ROBERT W. SADOWSKI

I, Robert W. Sadowski, pursuant to 28 U.S.C. § 1746, make the following statements in support of Plaintiff's opposition to Defendants' Joint Motion for Summary Judgment under penalty of perjury.

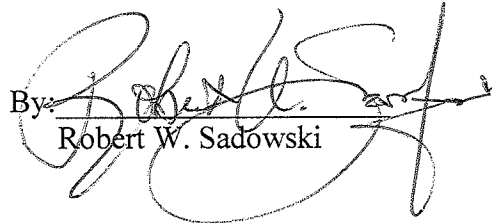
1. Attached hereto as Exhibit 1 is a true copy of Dr. Ali's Biographical Sketch, previously marked as Exhibit Ali 26.
2. Attached hereto as Exhibit 2 is a true copy of Dr. Ali's Curriculum Vitae, previously marked as Defendant's Exhibit A.
3. Attached hereto as Exhibit 3 is a true copy of Dr. Ali's deposition transcript dated September 29, 2020.

4. Attached hereto as Exhibit 4 is a true copy of the deposition transcript of Dr. Thaddeus Wandel dated September 30, 2020.
5. Attached hereto as Exhibit 5 is a true copy of a letter from the Accreditation Council for Graduate Medical Education to Dr. Thaddeus Wandel dated January 14, 2015, previously marked Exhibit Wandel 1.
6. Attached hereto as Exhibit 6 is a true copy of the deposition transcript of Dr. Sansar C. Sharma dated September 21, 2020.
7. Attached hereto as Exhibit 7 is a true copy of an e-mail chain between Dr. Raymond Wong and Marie Rivera from April and May 2016, previously marked Exhibit W 19.
8. Attached hereto as Exhibit 8 is a true copy of a letter from Dr. Raymond Wong Interim Chairman Department of Ophthalmology New York Medical College to Dr. D. Douglas Miller, Dean, School of Medicine New York Medical College dated May 10, 2016, previously marked Exhibit Ali 7.
9. Attached hereto as Exhibit 9 is a true copy of Meeting Minutes from a meeting on July 20, 2018, attended by Amro Ali, MD; Fredrick Bierman, MD; Kelly Hutcheson, MD; Thaddeus Wandel, MD; and Michelle Hodge (note taker), previously marked Exhibit Bierman 3.
10. Attached hereto as Exhibit 10 is a true copy of New York Medical College GME Policy USMLE Step 3, adopted by the GME Committee of New York Medical College 9/24/2008, previously marked Exhibit Ali 1.
11. Attached hereto as Exhibit 11 is a true copy of Pages 1, 40, and 41 of Westchester Medical Center Resident/Fellow Agreement, Terms of Appointment, Policies and Procedures 2016-2017, previously marked as Exhibit Ali 23.

12. Attached hereto as Exhibit 12 is a true copy of an e-mail chain from July 10 and 11, 2018 between Amro Ali and Legal@acgme.org, previously marked Exhibit Ali 19.
13. Attached hereto as Exhibit 13 is a true copy of an e-mail chain from January, February and July 2018 between the New York State Boards for Medicine *et al.*, Amro Ali and Sansar Sharma, previously marked Exhibit Sharma 14.
14. Attached hereto as Exhibit 14 are letters of recommendation regarding Dr. Amro Ali from various dates and institutions, previously marked Exhibit Ali 2, Exhibit Ali 3, and Exhibits H, I, J, K, and L.
15. Attached hereto as Exhibit 15 is a true copy of a letter of recommendation regarding Amro Ali dated September 10, 2016, from Dr. Thaddeus Wandel, previously marked Exhibit Wandel 3.
16. Attached hereto as Exhibit 16 is a true copy of a letter of recommendation regarding Amro Ali dated September 14, 2016, previously marked Exhibit Sharma 4.
17. Attached hereto as Exhibit 17 is a true copy of a letter appointing Amro Ali, M.D., to the faculty of New York Medical College as Instructor of Ophthalmology dated April 7, 2016, previously marked Exhibit Ali 5.
18. Attached hereto as Exhibit 18 is a true copy of an e-mail dated July 18, 2018, from Amro Ali to Kelly Hutcheson, previously marked Exhibit Hutcheson 10.
19. Attached hereto as Exhibit 19 is a true copy of a draft letter addressed to Dr. Hutchinson (sic) with blackline mark-up/edits, previously marked as Defendant's Exhibit R.
20. Attached hereto as Exhibit 20 is a true copy of an e-mail chain dated June 29, 2018 between Amro Ali and Sansar C. Sharma, previously marked Exhibit Sharma 13.

21. Attached hereto as Exhibit 21 is a true copy of the deposition transcript of Dr. Raymond Wong dated October 21, 2020.
22. Attached hereto as Exhibit 22 is a true copy of an e-mail chain dated December 30 and 31, 2016 between Amro Ali and Dr. Thaddeus Wandel, previously marked as Exhibit Wandel 6.
23. Attached hereto as Exhibit 23 is a true copy of the deposition transcript of Randi Joy Hartman dated October 21, 2020.
24. Attached hereto as Exhibit 24 is a true copy of the Spring 2018 issue of the WMC Department of Ophthalmology newsletter, previously marked as Exhibit Ali 21.
25. Attached hereto as Exhibit 25 is a true copy of the deposition transcript of Kelly Hutcheson, M.D. dated September 25, 2020.
26. Attached hereto as Exhibit 26 is a true copy of the deposition transcript of Michelle Hodge dated October 16, 2020.

Executed: New York, New York
November 28, 2020

By: 
Robert W. Sadowski